Mr. J. Mark Erler
Erler Industries, Inc.
P.O. Box 219
North Vernon, IN 47265

Re: **079-11008**
Significant Source Modification to:
Part 70 permit No.: **T 079-7572-00010**

Dear Mr. Erler:

Erler Industries, Inc. was issued Part 70 operating permit **T 079-7572-00010** on September 23, 1998 for an operation which spray paints plastic and metal parts. An application to modify the source was received on May 27, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to

incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask Paula M. Miano, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PMM/MES
cc: File - Jennings County
U.S. EPA, Region V
Jennings County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Erler Industries, Inc.
418 Stockwell Street
North Vernon, Indiana 47265

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T079-7572-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 23, 1998

First Administrative Amendment 079-10586-00010 drafted May 6, 1999

Part 70 First Significant Source Modification: 079-11008-00010-00010	Pages Affected: 4, 5, 6, 19, 34a and 34b supercede 34, 40a Section Added: D.4, 34c and 34d
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official:	J. Mark Erler
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
SIC Code:	3479, 3663
County Location:	Jennings
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line 1, with three (3) manual paint booths, identified as EU1, EU2, and EU3 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.

(2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Located in Plant 2 (71 Hayden Pike, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line A, with three (3) manual paint booths, identified as EU6, EU7 and EU8, respectively, with a maximum of two (2) HVLP guns per booth, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V6, S/V7, and S/V8.

(2) One (1) paint line, identified as Line B, with four (4) paint booths (each booth using HVLP guns, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V9, S/V10, S/V11, and S/V12): two (2) manual booths, identified as EU9 and EU10, and two (2) robot paint booths, identified as EU11 and EU12.

Line A and Line B each have a maximum capacity of 4.0 gallons/hour of conductive copper paint, a maximum capacity of 2.5 gallons/hour of conductive silver paint and a maximum capacity of 2.0 gallons/hour with conductive black paint.

Located in Plant 3 (125 West Hayden Pike, North Vernon, Indiana 47625)

(1) One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts that also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A, and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

(e) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven-IR3 and Oven-IR4.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary operation which spray paints plastic and metal parts is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC's is limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

SECTION D.3 FACILITY OPERATION CONDITIONS
INSIGNIFICANT ACTIVITIES

Facility Description [326 IAC 2-7-5(15)]

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

(e) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven-IR3 and Oven-IR4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) 100,000 Btu/hr natural gas fired ovens, identified as 6A and 7A, and the two (2) IR ovens, identified as 9A and 10A, located in Plant 1, and those facilities listed in Condition D.1.4, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.0 mmBtu/hr ovens, identified as 8B and 9B, located in Plant 2, and those facilities listed in Condition D.2.3, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.2 mmBtu/hr ovens, identified as Oven-1 and Oven-2, located in Plant 3, and those facilities listed in Condition D.4.2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Plant 3, Line 3

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The input VOC to Plant 3, Line 3 (EU13, EU14 and EU15) shall be limited to less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Plant 3, Line 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the dry filters on Plant 3, Line 3.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 3 is in operation.

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, S/V13, S/V14,and S/V15, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements [326 IAC 2-7-6]

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: 079-7572-00010
Facility: Plant 3/Line 3 (EU13, EU14, EU15)
Parameter: VOC
Limit: Less than 25.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

Source Name:	**Erler Industries, Inc.**
Source Location:	**418 Stockwell Street, North Vernon, Indiana 46265**
County:	**Jennings**
SIC Code:	**3663**
Operation Permit No.:	**T 079-7572-00010**
Operation Permit Issuance Date:	**September 28, 1998**
Significant Source Modification	**No.: T 070-11008-00010**
Permit Reviewer:	**Paula M. Miano/MES**

The Office of Air Management (OAM) has reviewed a modification application from Erler Industries, Inc. relating to the construction of the following emission units and pollution control devices:

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

History

On May 27, 1999, Erler Industries, Inc. submitted an application to the OAM requesting to add additional paint booths to their existing plant. Erler Industries, Inc. was issued a Part 70 permit on September 23, 1998. The First Administrative Amendment, AA 079-10586-00010 was drafted May 6, 1999.

Source Definition

This company which spray paints plastic and metal parts consists of three (3) plants:

(a) Plant 1 is located at 418 Stockwell Street, North Vernon, Indiana 47265,

(b) Plant 2 is located at 71 Hayden Pike, North Vernon, Indiana 47265; and

(c) Plant 3 is located at 418 Stockwell Street, North Vernon, Indiana 47265.

Since the three (3) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV-13	paint booth	27.0	2.4	15,000	80.0
SV-14	paint booth	27.0	2.4	15,000	80.0
SV-15	paint booth	27.0	2.4	15,000	80.0

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 27, 1999, Additional information was received on July 6, 1999.

Emission Calculations

See Appendix A, pages 1 through 2 of 2, of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	3.91
PM_{10}	3.91
SO_2	0.0
VOC	47.8
CO	0.0
NO_X	0.0

HAPs	Potential To Emit (tons/year)
Xylene	9.24
Ethyl Benzene	2.31
MIBK	8.61
Glycol Ethers	0.957
TOTAL	21.1

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7.10.5(f)(4).

County Attainment Status

The source is located in Jennings County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone.

(b) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0
PM_{10}	0
SO_2	0

Pollutant	Emissions (tons/yr)
VOC	228
CO	0.180
NO_X	1.23

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on the Technical Support Document for T 079-7572-00010, issued September 23, 1998, for VOC and the AIRS Facility Subsystem Quick Look Report dated March 30, 1998 for all other pollutants.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (tons/yr)	PM_{10} (tons/yr)	SO_2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_X (tons/yr)
Proposed Modification	0.020	0.020	0.00	24.0	0.00	0.00
Proposed Overall Source Limits				249		
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply. The source is proposing to take a Plant 3/Line 3 VOC limit of 24.0 tons per year in order to avoid the applicability of 326 IAC 8-1-6. The source is also proposing to take an overall source-wide VOC limit of 249 tons per year. Therefore, this source will remain an existing minor PSD source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source may be subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 60, Subpart TTT (Surface Coating of Plastic Parts for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines). Since the source surface coats cellular telephones, which are not considered business machines, the requirements of 40 CFR 60, Subpart TTT are not applicable.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source will remain minor pursuant to this rule since the overall source wide VOC emissions will be limited to 249 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

Plant 3, Line 3 does not have the potential to emit more than 10 tons per year of a single HAP and/or 25 tons per year of any combination of HAPs; therefore, 326 IAC 2-4.1 is not applicable.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the three (3) paint booths EU13, EU14,and EU15 and the two (2) natural gas fired ovens Oven-1 and Oven-2, and the one (1) air make-up unit shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

The dry filters shall be in operation at all times the three (3) paint booths are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New facilities, general reduction requirements)

Plant 3, Line 3 has the potential to emit more than 25 tons per year of VOC; therefore, 326 IAC 8-1-6 could be applicable. Since the source has accepted a 24.0 tons per year of VOC limit, the requirements of 326 IAC 8-1-6 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Plant 3, Line 3 has applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of EU-13, EU-14, and EU-15 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The dry filters shall be in operation at all times that EU-13, EU-14 and/or EU-15 are in operation.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations, page 2 of 2 of Appendix A for detailed air toxic calculations.

Proposed Changes

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official:	J. Mark Erler
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
SIC Code:	3479, **3663**
County Location:	Jennings
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line 1, with three (3) manual paint booths, identified as EU1, EU2, and EU3 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.

(2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Located in Plant 2 (71 Hayden Pike, North Vernon, Indiana 47265):

(1) One (1) paint line, identified as Line A, with three (3) manual paint booths, identified as EU6, EU7 and EU8, respectively, with a maximum of two (2) HVLP guns per booth, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V6, S/V7, and S/V8.

(2) One (1) paint line, identified as Line B, with four (4) paint booths (each booth using HVLP guns, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V9, S/V10, S/V11, and S/V12): two (2) manual booths, identified as EU9 and EU10, and two (2) robot paint booths, identified as EU11 and EU12.

Line A and Line B each have a maximum capacity of 4.0 gallons/hour of conductive copper paint, a maximum capacity of 2.5 gallons/hour of conductive silver paint and a maximum capacity of 2.0 gallons/hour with conductive black paint.

Located in Plant 3 (418 Stockwell Street, North Vernon, Indiana 47625)

(1) One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary operation which spray paints plastic and metal parts that also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A, and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOC's is limited to ~~228~~ **less than 250** tons per ~~365 consecutive day~~ **twelve (12) consecutive month** period~~.~~ Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

SECTION D.3 FACILITY OPERATION CONDITIONS INSIGNIFICANT ACTIVITIES

Facility Description [326 IAC 2-7-5(15)]

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) 100,000 Btu/hr natural gas fired ovens, identified as 6A and 7A, and the two (2) IR ovens, identified as 9A and 10A, located in Plant 1, and those facilities listed in Condition D.1.4, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.0 mmBtu/hr ovens, identified as 8B and 9B, located in Plant 2, and those facilities listed in Condition D.2.3, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The PM from the two (2) 1.2 mmBtu/hr ovens, identified as Oven-1 and Oven-2, located in Plant 3, and those facilities listed in Condition D.4.2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - Plant 3, Line 3

Located in Plant 3

One (1) paint line, identified as Plant 3, Line 3, with three (3) paint booths, identified as EU13, EU14, and EU15, with a maximum capacity of 437 plastic parts per hour total, equipped with HVLP spray guns and dry filters for particulate matter control, exhausting to S/V 13, SV14, and S/V15 respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

The input VOC to Plant 3, Line 3 (EU13, EU14 and EU15) shall be limited to less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Plant 3, Line 3 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Plant 3, Line 3 and any dry filters.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 3 is in operation.

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V13, S/V14, and S/V15, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements [326 IAC 2-7-6]

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. T 079-11008-00010.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70
Significant Source Modification

Source Name:	**Erler Industries, Inc.**
Source Location:	**418 Stockwell Street, North Vernon, Indiana 46265**
County:	**Jennings**
SIC Code:	**3663**
Operation Permit No.:	**T 079-7572-00010**
Operation Permit Issuance Date:	**September 28, 1998**
Significant Source Modification	**No.: T 070-11008-00010**
Permit Reviewer:	**Paula M. Miano/MES**

On August 10, 1999, the Office of Air Management (OAM) had a notice published in the Plain Dealer and Sun, North Vernon, Indiana, stating that Erler Industries, Inc. had applied for a Part 70 Significant Source Modification to operate a stationary plastic and metal parts spray painting operation with control. The notice also stated that OAM proposed to issue a Part 70 Significant Source Modification for this operation and provided information on how the public could review the proposed Part 70 Significant Source Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Significant Source Modification should be issued as proposed.

On August 24, 1999, Thomas E. Rarick of Keramida Environmental, Inc., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Comment 1:

Condition A.2 Emission Units and Pollution Control Equipment Summary lists the Plant 3 address as 418 Stockwell Street, North Vernon, Indiana 47625. This is incorrect and should be changed as follows:

Located in Plant 3 (125 West Hayden Pike, North Vernon, Indiana 47625)

Response 1:

Condition A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)] has been changed as follows:

Located in Plant 3 (~~418 Stockwell Street~~ **125 West Hayden Pike**, North Vernon, Indiana 47625)

Comment 2:

Condition A.2 Specifically Regulated Insignificant Activities does not include two (2) infra-red ovens located in Plant 3. Please include these two ovens in the description found in Condition A.3. These IR ovens should be identified as Oven-IR3 and Oven-IR4.

Response 2:

Condition A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] and D.3 have been changed as follows:

This stationary operation which spray paints plastic and metal parts that also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Four (4) curing ovens: two (2) 100,000 Btu/hr natural gas fired ovens located in Plant 1, identified as 6A, and 7A, exhausting to respective stacks identified as S/V 15 and S/V16; two (2) 1.0 mmBtu/hr ovens located in Plant 2, identified as 8B and 9B exhausting to their respective stacks identified as S/V13 and S/V14.

(b) Two (2) infra-red (IR) ovens, located in Plant 1, identified as 9A and 10A.

(c) Two (2) natural gas fired ovens located in Plant 3, identified as Oven-1 and Oven-2, exhausting to S/V3-1 and S/V3-2 respectively, rated at 1.2 mmBtu/hr, each.

(d) One (1) air make-up unit, located in Plant 3, identified as AM-1, rated at 6.0 mmBtu/hr.

(e) Two (2) infra-red (IR) ovens, located in Plant 3, identified as Oven-IR3 and Oven-IR4.

Comment 3:

Condition C.1(b) PSD Minor Source Status We would request that this condition be deleted or modified, since an increase in the source's potential to emit above 250 tons would not require the source to undergo PSD review.

Response 3:

Condition C.1(b) refers to the emissions from the modification covered by this permit and not to the emissions from the entire source. Any change or modification which would increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit would require PSD review as a major modification to an existing minor PSD source. Therefore no changes were made to this condition.

Comment 4:

Condition D.4.3 Preventive Maintenance Plan As currently worded, this condition states that a Preventive Maintenance Plan is required for the entire line and not just the dry filters. We request the following changes be made to this condition (italicized language should be added, language with highlighting should be deleted):

A preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for *the dry filters on Plant 3, Line 3*. Plant 3, Line 3 and any dry filters.

Response 4

Condition D.4.3 has been revised as indicated below to clarify that a Preventive Maintenance Plan is only required for the dry filters of Line 3.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **the dry filters on** Plant 3, Line 3.~~and any dry filters~~.

Comment 5:

Condition D.4.7 Monitoring We request the following changes be made to this condition (italicized language should be added, language with highlighting should be deleted):

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily *weekly* observations shall be made of the overspray from the surface coating booth stacks . . .

(b) Weekly *Monthly* inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. . .

Response 5:

Condition D.4.7 has been revised as follows to comply with the current guidance on the frequency of dry filter compliance monitoring:

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks, S/V13, S/V14,and S/V15, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Appendix A: Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: 079-11008
Plt ID: 079-00010
Reviewer: Paula M. Miano
Date Received: May 27, 1999

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
PB-13, PB-14, PB-15																
Clearcoat XPC60014	8.20	65.5%	0.0%	65.5%	0.0%	28.0%	0.00132	437	5.37	5.37	3.10	74.48	13.59	1.79	19.18	75%
Hardner XPH80002	8.70	40.0%	0.0%	40.0%	0.0%	53.0%	0.00038	437	3.48	3.48	0.57	13.79	2.52	0.94	6.57	75%
Ready to Spray	**8.31**	**59.6%**	**0.0%**	**59.6%**	**0.0%**	**33.6%**	**0.00170**	**437**	**4.95**	**4.95**	**3.68**	**88.27**	**16.11**	**2.73**	**14.75**	**75%**
Light Titanium Gray XPB20003	8.00	75.5%	0.0%	75.5%	0.0%	17.5%	0.00125	437	6.04	6.04	3.30	79.18	14.45	1.17	34.51	75%
Reducing Solvent XPS90013	7.20	100.0%	0.0%	100.0%	0.0%	0.0%	0.00125	437	7.20	7.20	3.93	94.39	17.23	0.00	n/a	75%
Ready to Spray	**7.60**	**87.1%**	**0.0%**	**87.1%**	**0.0%**	**8.8%**	**0.00250**	**437**	**6.62**	**6.62**	**7.23**	**173.58**	**31.68**	**1.17**	**75.66**	**75%**
								Control	VOC	PM						
								Efficiency	0.00	99.0%						
State Potential Emissions										**Uncontrolled**	**10.9**	**262**	**47.8**	**3.91**		
										Controlled	**10.9**	**262**	**47.8**	**0.039**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used
RTS Density (lbs/gal) = ((Density(lb/gal)a * Gal of Material (gal/unit)a) + (Density(lb/gal)b * Gal of Material (gal/unit)b)) / (Gal of material (gal/unit)a + Gal of Material (gal/unit)b)
RTS Weight % H2O + Organics = ((Weight % Organics + H2O)a * Density (lb/gal)a * Gal of Material (gal/unit)a) + ((Weight % Organics + H2O)b * Density (lb/gal)b * Gal of Material (gal/unit)b) / ((Density (lb/gal)a * Gal of Material (gal/unit)a)+(Density (lb/gal)b * Gal of Material (gal/unit)b))

Appendix A: Potential Emissions Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: Erler Industries, Inc.
Address City IN Zip: 418 Stockwell Street, North Vernon, Indiana 47265
CP: 079-11008
Plt ID: 079-00010
Reviewer: Paula M. Miano
Date Received: May 27, 1999

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % MIBK	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	MIBK Emissions Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
PB-13, PB-14, PB-15											
Clearcoat XPC60014	8.20	0.00132	437	20.00%	5.00%	0.00%	0.00%	4.14	1.04	0.00	0.00
Hardner XPH80002	8.70	0.00038	437	20.00%	5.00%	0.00%	0.00%	1.27	0.32	0.00	0.00
Light Titanium Gray XPB20003	8.00	0.00125	437	20.00%	5.00%	0.00%	5.00%	3.83	0.96	0.00	0.96
Reducing Solvent XPS90013	7.20	0.00125	437	0.00%	0.00%	50.00%	0.00%	0.00	0.00	8.61	0.00

State Potential Emissions	**(tons/yr):**	**9.24**	**2.31**	**8.61**	**0.957**
	(lb/hr):	**2.11**	**0.527**	**1.97**	**0.219**
	(g/sec):	**0.266**	**0.066**	**0.248**	**0.028**

Overall Total	**(tons/yr):**	**21.1**
	(lb/hr):	**4.82**
	(g/sec):	**0.607**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all solvents used